

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF NEW YORK

MICHAEL DONOGHUE and PREMIUM
MORTGAGE CORPORATION,

Plaintiffs,

-vs-

20-cv-06100

CYNTHIA NOSTRO, DYLAN RANDALL,
DAVID POPHAM, and EVERETT FINANCIAL, INC.
d/b/a SUPREME LENDING,

Defendants.

DECLARATION OF NON-PARTY JACKIE RUOTSI

JACKIE RUOTSI, pursuant to 28 U.S. Code § 1746, declares under penalty of perjury that the following is true and correct:

1. I am currently employed by Premium Mortgage Corporation (“Premium”), one of the plaintiffs in this action, as a Mortgage Loan Originator. I was employed by Premium from 2013 until I resigned at the end of April 2019; and I started working again for Premium in March 2022.

2. In or about the end of April 2019, I began to work for Everett Financial, Inc. d/b/a Supreme Lending (“Supreme”), one of the defendants in this matter, and I resigned from my employment with Supreme in March 2022.

3. In my role as a Mortgage Loan Originator, I work with and help customers obtain mortgage loans in connection with the purchase of residential properties.

4. On or about the morning of May 10, 2022, I was served with a subpoena at my home.

5. I understand that Supreme is requesting that I produce all documents and all communications relating to my six years of employment with Premium and my nearly three years of employment with Supreme, in addition to all documents and all communications concerning current and potential customers of both Premium and Supreme over that same nine-year period.

6. I also understand that the subpoena would require that I hire an e-Discovery vendor to search all of my records over a nine-year period of time and produce anything having to do with Premium, Supreme, and the work that I did as part of my employment for those two companies.

7. Lastly, while working for Supreme, I do not recall ever being asked by my employer, or by someone on its behalf, to provide documents in connection with this litigation.

Pursuant to 28 U.S. Code § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on 5.20.22


By: Jackie Ruotsi